

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

THOMAS F. BROWN,
Plaintiff,

vs.

ALAMO COMMUNITY COLLEGE DISTRICT
ET. AL.,
Defendants.

**CIVIL ACTION NO.
5:11-CV-00807-FB-NSN**

PLAINTIFF'S RULE 15, A2 MOTION TO AMEND COMPLAINT

Plaintiff requests court's leave to file an amended complaint, in accordance with Federal Rules of Civil Procedure Rule 15, A2.

I filed pro se because of difficulty in finding a lawyer in San Antonio. Employment law specialists who will represent plaintiffs are far fewer in number than those representing employers. I have contacted every San Antonio employment lawyer I could find who represents employees. They have had a full slate or have not gotten back to me. (Meanwhile, defendants maintain a staff of two full-time lawyers, plus two additional outside lawyers imported from Houston just for this case. This creates a David and Goliath situation for me.)

As a consequence, I filed pro se using the standard form provided by the court for pro se plaintiffs. The form contains a checklist of jurisdictions, but the checklist does not include common law torts, which holds defendants individually accountable for defamation, intentional and outrageous infliction of distress, and for tortiously interfering with employment.

I request the court's leave to amend my complaint to include common law tort claims and related federal protections in the list of jurisdictions. Rule 15, A2 states that: "The court should freely give leave when justice so requires". In this case, justice requires that those who violate the law

not escape accountability due to a technicality caused by an incomplete checklist on the pro se manual complaint form.

Signed

Thomas Brown

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757-751-0892

2.19.12

Certificate of Service

Defendants' lawyer was served via CM/ECF on February 19, 2012.